



Date: **March 17, 2005**

Number: **CLECALL05-044**

Effective Date: **N/A**

Category: **Loop-Transport (UNE)**

Subject: **(BUSINESS PROCESSES) SBC's¹ Methodology to Determine Non-Impairment for Loop-Transport**

Related Letters: **CLECALL05-039 Loop/Transport CLEC Self-Certification; CLECALL05-037 Loop/Transport Non-Impaired Wire Center Information; CLECALL05-019 Loop/Transport Order Rejection; CLECALL05-020 Loop/Transport Price Increase/Transition Period; and CLECALL05-027 and CLECALL05-031 Loop/Transport Non-Impaired Wire Center Identification**

Attachment: **NO**

States Impacted: **13-States**

Issuing SBC ILECS: **SBC Indiana, SBC Ohio, SBC Michigan, SBC Wisconsin, SBC California, SBC Nevada, SBC Arkansas, SBC Illinois, SBC Kansas, SBC Missouri, SBC Oklahoma, SBC Texas and SBC Connecticut**

Response Deadline:

Contact: **See Contact in this AL**

Conference Call/Meeting: **N/A**

To: **SBC's Wholesale Customers**

This is in response to CLEC inquiries regarding to the methodology by which SBC has determined non-impairment for Dedicated Interoffice Transport and High-Capacity UNE loops consistent with parts IV, V, and VI of the FCC's Triennial Review Remand Order (TRRO), FCC 04-290, released February 4, 2005.

Wire center based Impairment Criteria

SBC determined wire center classification based on the business line and fiber based collocater criteria specified in the FCC's TRRO definitions of Business Line and Fiber-based Collocater in 47 C.F.R. § 51.5, the loop impairment criteria set forth in 47 C.F.R. § 51.319(a)(4), and the wire center tier requirements set forth for dedicated transport in 47 C.F.R. § 51.319(e)(3).

Dedicated Interoffice Transport

Wire centers with at least 38,000 business lines and/or 4 or more fiber-based collocaters were designated as Tier 1 Wire Centers. Tier 1 wire centers also include tandem switching locations that have no line-side switching facilities, but nevertheless serve as a point of traffic aggregation accessible by competitive LECs.

Wire centers that did not qualify as Tier 1 wire centers that had at least 24,000 business lines and/or 3 fiber-based collocaters were designated as Tier 2 Wire Centers.

All remaining wire centers not listed as Tier 1 or Tier 2 were classified as Tier 3.

¹ References to "SBC" in this Accessible Letter encompass, as applicable, the Issuing SBC ILECs identified at the beginning of this letter.

High-Capacity Loops

Wire centers with at least 60,000 business lines and 4 or more fiber-based collocators were designated as non-impaired for DS1 Loops.

Wire centers with at least 38,000 business lines and 4 or more fiber-based collocators were designated as non-impaired for DS3 Loops.

Data Sources

The business line information SBC has made available for inspection as referenced in Accessible Letters CLECALL05-037 and CLECALL05-039 includes the total number of ARMIS 43-08 business lines, the total number of UNE-P business lines (based on class of service specified by CLEC when ordered), the total number of UNE loops, and the sum of these three categories (the total number of all business lines for the wire center). As required in the definition of "Business line" set forth in 47 C.F.R. § 51.5, ISDN and other digital access lines were determined by calculating each 64 kbps-equivalent as one line. The data also includes the number of fiber-based collocators per wire center.

Business Line Data

The business line counts provided by SBC are based on ARMIS 43-08 business lines, plus business UNE-P, plus UNE-loops. All business line data is from December 2003 (the most recent ARMIS 43-08 FCC filing).

ARMIS 43-08

SBC relies upon ARMIS 43-08 data for total business line counts used in SBC's filing. The business line count for the ARMIS 43-08 data reflects the FCC's most recent instructions (<http://www.fcc.gov/wcb/armis/instructions/#4308>). (See instructions for reporting Business Switched Access Lines Table III):

The FCC specified that ILECs should use ARMIS 43-08 data as a component in its business line count (TRRO ¶ 105). SBC used the following definition of business lines for the ARMIS 48-03 data it included in its March 3, 2005 filing at the FCC.

The following information is excerpted from the FCC's current ARMIS instructions:

"Business Switched Access Lines - Total voice-grade equivalent analog or digital switched access lines to business customers.

(fc) Single Line Business Switched Access Lines - Includes single line business access lines subject to the single line business interstate end user common line charge, pursuant to § 69.104(h), excluding company official, mobile telephone/pagers and payphone lines. Payphone lines are to be reported in column (fe) - Payphone Lines. The ratio of single line business access lines to total business access lines, as calculated from the data reported in Table III (i.e., column (fc) divided by the sum of columns (fc) and (fd)), should be consistent with the same ratio as calculated from the data reported in ARMIS Report 43-01, Table II.

(fd) Business Switched Access Lines - Include the total of analog and digital multiline business access lines subject to the multiline business interstate end user common line charge including PBX trunks, Centrex-CU trunks, hotel/motel LD trunks and Centrex-CO lines. Payphone lines are to be reported in column (fe) - Payphone Lines. The ratio of multiline business access lines to total business access lines, as calculated from the data reported in Table III, (i.e., column (fd) divided by the sum of columns (fc) and (fd)), should be consistent with the same ratio as calculated from the data reported in ARMIS Report 43-01, Table II.

(fe) Payphone Lines - Lines that provide payphone service, i.e., total coin (public and semi-public) lines, including customer owned pay telephones (COPT).

As required by the FCC's instructions for column (fd) listed above, SBC included business "PBX trunks, Centrex-CU trunks, hotel/motel LD trunks and Centrex-CO lines" in its business line count. SBC counted PBX and Centrex trunks and Centrex Extensions as shown below. The following information is excerpted from the FCC's current ARMIS instructions located at <http://www.fcc.gov/wcb/armis/instructions/#4308>. (See instructions for reporting under columns (cd) and (ce) for Table II).

(cd) PBX and Centrex Trunks - Enter the total number of (a) analog trunks provided between the central office and a customer location PBX or Centrex, including Centrex-CU Trunks, PBX Trunks, and Hotel/Motel LD Trunks over 4 kHz or equivalent facilities, where service is provided by equipment located on customer-controlled space, and (b) 64 kbps or equivalent digital trunks terminated on a customer location PBX and/or Centrex, including Centrex-CU trunks. Do not include resold services, which are to be included in column (ci) - Other Switched Access Lines.

(ce) Centrex Extensions - For service that is provided by equipment connecting a Centrex-CO on telephone company premises to station equipment on the customer's premises, including service provided by a digital Centrex to analog station equipment, enter the total number of analog circuits and 64 kbps or equivalent digital circuits, including ISDN-based Centrex-CO Lines. Do not include resold services, which are to be included in column (ci) - Other Switched Access Lines.

As illustrated above, the FCC's ARMIS 43-08 reporting instructions include specific instructions for counting Centrex trunks and extensions.

UNE Data

SBC has elected to provide UNE data as of December 31, 2003 in order to be consistent with the ARMIS-based data described above. The source of SBC's UNE data is SBC billing information. The UNE-P business line total is based upon the type of service indicated by the CLEC on the service order, and only includes UNE-P business lines. SBC UNE-P business line counts are categorized by loop type, including 2-W analog, 2-W digital and DS1. The UNE loop total includes all UNE loops that are not part of a UNE-P arrangement, including DS-1 UNE loops and DS-3 UNE loops.

The basis by which UNE business lines are counted are provided below:

2-W Analog UNE loops = 1 equivalent
2-W Analog Business UNE-P = 1 equivalent
2-W Digital UNE loops = 2 equivalent
2-W Digital UNE-P loops = 2 equivalent
DS1 UNE-P = 24 equivalent
DS1 UNE Loop = 24 equivalent
DS3 UNE Loop = 672 equivalent

Fiber-based Collocation

In order to ensure accuracy for the fiber-based collocator count, SBC performed physical inspections in February 2005 to determine the number of fiber-based collocators in all wire centers classified as Tier 1 or Tier 2 or as non-impaired for DS1 or DS3 loops. SBC only counted fiber-based collocators that are not affiliated with SBC. In cases where two or more carriers affiliated with each other were located in a single wire center, SBC only counted one of the carriers as a fiber-based collocator.

A fiber-based collocator is a carrier that maintains a collocation arrangement in an SBC wire center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that terminates at a collocation arrangement within the wire center and leaves the incumbent LEC wire center premises. The verification of the fiber based collocator data was lead by network forces knowledgeable of collocation arrangements. The network forces verified the collocators' physical access to fiber (or comparable transmission facility) terminating at the collocation arrangement and leaving the SBC premise. While at the collocation areas, the network forces verified whether the power for each collocation arrangement was active. This determination was made based on whether the power to the collocation arrangement had been fused or by viewing working equipment inside the collocator space.

Any additional questions regarding this accessible letter should be directed to your account manager.